



**THE CITY OF NEW YORK
LAW DEPARTMENT**

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September 14, 2011

By ECF

Honorable Andrew L. Carter, Jr.
United State Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Robert Bugliaro v. Det. James Schweiker, et al.
1:10-cv-4881-FB-ALC

Your Honor:

I am an Assistant Corporation Counsel in the office of Michael A. Cardozo, Corporation Counsel of the City of New York, representing defendants The City of New York, New York City Police Department, James Schweiker, Patrick McGuire and Edward Hennessy in this action. I am writing with plaintiff's counsel's consent and in accordance with the Court's instructions during the September 9, 2011 conference call to advise the Court of the agreed-upon schedule for the individual defendant's depositions..

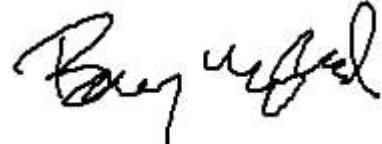
The individually named defendants James Schweiker, Patrick McGuire and Edward Hennessy will be produced for depositions on October 4, October 6 and October 12, 2011. In addition, the parties have agreed to block out October 14, 2011 as a reserve or backup date in the event the depositions cannot proceed on the agreed upon dates due to some last minute conflict. As it turns out the September 22 and September 26 dates discussed during the conference call could not be scheduled due to police staffing issues arising from the heightened security requirements for the 2011 UN Assembly.

The parties will provide the Court with a status report on October 17, 2011 regarding the completion of these depositions, further discovery to be completed, and to establish a revised fact and expert discovery end date (from the current discovery end date of September 15, 2011).

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Thank you for your consideration herein.

Respectfully submitted,



Barry Myrvold

cc: Norman Steiner By ECF

Robert Tolchin/Daniel Shimko By ECF
The Berkman Law Office
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